

EXHIBIT B

Excerpts from Deposition of Chelsie Bright

CHELSIE B. SAKURADA
DELVECCHIA vs FRONTIER AIRLINES

April 17, 2019

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<p>1 UNITED STATES DISTRICT COURT</p> <p>2 FOR THE DISTRICT OF NEVADA</p> <p>3 -o0o-</p> <p>4</p> <p>5 PETER DELVECCHIA, et al.,)</p> <p>6 Plaintiff,) Civil No.: 2:19-CV-01322-KJD-NJK</p> <p>7 v.)</p> <p>8 FRONTIER AIRLINES, INC.,)</p> <p>9 et al.,)</p> <p>10 Defendants.)</p> <p>11</p> <p>12</p> <p>13</p> <p>14 VIDEOTAPED DEPOSITION OF CHELSIE SAKURADA</p> <p>15 Taken on December 3, 2109</p> <p>16 at 9:54 a.m.</p> <p>17</p> <p>18</p> <p>19 ADVANCED REPORTING SOLUTIONS</p> <p>20 159 West Broadway</p> <p>21 Broadway Lofts, Suite 100</p> <p>22 Salt Lake City, Utah 84101</p> <p>23</p> <p>24 REPORTED BY: Michelle Mallonee, RPR, CSR</p> <p>25</p>	<p>1 I N D E X</p> <p>2 WITNESS PAGE</p> <p>3</p> <p>4 CHELSIE SAKURADA</p> <p>5 Examination by Mr. McKay 5</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10 E X H I B I T S</p> <p>11</p> <p>12 EXHIBIT NO. DESCRIPTION PAGE</p> <p>13 Exhibit 1 - Las Vegas Metropolitan Police 87</p> <p>14 Department Voluntary Statements; Bates</p> <p>15 labeled 19AZF0229 DELVECCHIA FRONTIER</p> <p>16 0115 through 0121</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>
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<p>1 APPEARANCES</p> <p>2</p> <p>3 For Plaintiff:</p> <p>4 John D. McKay, Esq.</p> <p>5 PARK AVENUE LAW, LLC</p> <p>6 1255 East Logan Avenue</p> <p>7 Salt Lake City, Utah 84105</p> <p>8 (800) 391-3654</p> <p>9 johndmckayatty@gmail.com</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14 For Defendant:</p> <p>15 Tara Shelke, Esq.</p> <p>16 ADLER MURPHY & MCQUILLEN LLP</p> <p>17 20 South Clark Street, Suite 2500</p> <p>18 Chicago, Illinois 60603</p> <p>19 (312) 345-0700</p> <p>20 tshelke@amm-law.com</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p>1 P R O C E E D I N G S</p> <p>2 -o0o-</p> <p>3 THE VIDEOGRAPHER: This is Media 1 to the</p> <p>4 videotaped deposition of Chelsie Bright "Sakurad" -- is</p> <p>5 that correct?</p> <p>6 THE WITNESS: Sakurada.</p> <p>7 THE VIDEOGRAPHER: Sakurada.</p> <p>8 -- in the matter of Peter Delvecchia versus</p> <p>9 Frontier Airlines, being heard before the U.S. District</p> <p>10 Court for the District of Nevada, Case 2:19-CV-01322.</p> <p>11 This deposition is taking place at Advanced</p> <p>12 Reporting Solutions in Salt Lake City, Utah. Today's</p> <p>13 date is December 3rd, 2019. The time is 9:54.</p> <p>14 Will counsel please state who they are and who</p> <p>15 they represent.</p> <p>16 MR. MCKAY: I'm John McKay of Park Avenue Law,</p> <p>17 and I represent the plaintiffs, Peter Delvecchia and A.D.</p> <p>18 MS. SHELKE: I'm Tara Shelke, last name's</p> <p>19 spelled S-H-E-L-K-E, on behalf of Defendant Frontier</p> <p>20 Airlines.</p> <p>21 THE VIDEOGRAPHER: Will the court reporter</p> <p>22 please swear in the witness.</p> <p>23 //</p> <p>24 //</p> <p>25 //</p>

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<p style="text-align: right;">Page 33</p> <p>1 Q. Because they -- they have more work and more 2 customer interaction? 3 A. Correct. 4 Q. Okay. All right. Let's talk about now the 5 flight that occurred on March 28 of this year, 2019. And 6 the flight that is the subject of this litigation is -- 7 MR. MCKAY: I always forget the number. Is it 8 2067? 9 MS. SHELKE: Right. 10 Q. (BY MR. MCKAY:) 2067 from Raleigh-Durham 11 International Airport to Las Vegas McCarran Airport. 12 Do you remember that flight? 13 A. Yes. 14 Q. Were you on a trip that involved a flight or 15 flights prior to that flight? 16 A. I don't remember. 17 Q. You don't remember. 18 A. Hmm-mm. 19 Q. Okay. Is there any possibility -- well, first 20 of all, where are you based? 21 A. Vegas -- Las Vegas. 22 Q. Okay. So is there any possibility that you 23 would have deadheaded out to the East Coast and then 24 started a trip from Raleigh-Durham? 25 A. Most likely not me, no. There is a possibility</p>	<p style="text-align: right;">Page 35</p> <p>1 Q. All right. And so you would have been the 2 person standing at the doorway, greeting passengers as 3 they arrived on the plane? 4 A. Correct. 5 Q. All right. Do you remember seeing my clients -- 6 A. No. 7 Q. -- board the plane? 8 A. Not walk in. 9 Q. No, you didn't see them at that point? 10 A. Not that I remember. I see a lot of faces. 11 Q. Sure. What is -- well, let me -- let me ask you 12 this. Strike that. 13 Had you heard anything about them prior to the 14 boarding process? 15 A. No. 16 Q. Okay. What is the first thing that you remember 17 after boarding? 18 A. The C walked up to the exit row to do her 19 briefing, and I noticed she was doing her briefing. And 20 then she came back and said that she had a weird feeling 21 about the two. They were sitting in the exit row. And 22 she told me she had asked them how old the little boy 23 was, and the dad quickly answered with the age. And she 24 had to then switch them seats. So I do remember her 25 switching seats before she came back and let me know that</p>
<p style="text-align: right;">Page 34</p> <p>1 that the other flight attendants could. I don't deadhead 2 very often. 3 Q. Okay. So it's probable, then, that you started 4 in Las Vegas? 5 A. Yes. 6 Q. Okay. And if that's the case, would you have 7 flown from Las Vegas direct to Raleigh-Durham? 8 A. Maybe. 9 Q. Maybe. Okay. You just don't remember? 10 A. Hmm-mm. I don't remember if it was just a turn 11 or if it was, like, a three-day trip. I don't remember 12 that. 13 Q. I see. Okay. And if it was a three-day trip, 14 you would have had to spend the night somewhere? 15 A. Correct. 16 Q. And you just don't remember? 17 A. No. 18 Q. Okay. All right. So I guess we'll pick up, 19 then, with the flight that's the subject of this 20 litigation, 2067. 21 Do -- what's the earliest thing that you 22 remember about that flight? 23 A. I remember boarding the flight in particular. 24 Q. Because you were the A? 25 A. Yes.</p>	<p style="text-align: right;">Page 36</p> <p>1 that's what she was doing. 2 Q. And what is her name? 3 A. Anna. 4 Q. And this is Anna Bond? 5 A. Yes. 6 Q. Do you know Anna beyond working with her on that 7 flight? 8 A. Yes. 9 Q. Okay. Is she also based in Las Vegas? 10 A. Yes. 11 Q. Do you work with her frequently? 12 A. Yes. We're the same seniority almost. 13 Q. Okay. So you've known her for three years? 14 A. Yep. 15 Q. All right. And when you go out on a trip, is it 16 typically with Anna also working the flight? 17 A. It can be. It varies, but I worked with her 18 probably ten times before, which isn't a lot, but it is a 19 lot because there's a lot of flight attendants. I've 20 worked with her more -- more than I have other flight 21 attendants, yes. 22 Q. Okay. All right. And have you worked with her 23 several times since? 24 A. No. I went on maternity leave in July, so I 25 didn't work a lot after that.</p>

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<p style="text-align: right;">Page 37</p> <p>1 Q. Okay. All right. So I believe you said that</p> <p>2 after Anna Bond, the C position, brief to the exit row,</p> <p>3 she walked back.</p> <p>4 Do you mean back to the front of the plane or</p> <p>5 back to the back of the plane?</p> <p>6 A. Sorry. To the front.</p> <p>7 Q. To the front. Okay. So she briefed the</p> <p>8 passengers and then walked to where you were, which was</p> <p>9 in the front of the aircraft?</p> <p>10 A. Correct.</p> <p>11 Q. All right. Had you watched her brief the</p> <p>12 passengers? Exit row passengers, I mean.</p> <p>13 A. Yes, because then she started switching people.</p> <p>14 And that caught my attention. We don't switch people</p> <p>15 very often, so.</p> <p>16 Q. Okay.</p> <p>17 A. Yeah. She briefed them. And then -- I couldn't</p> <p>18 hear her, but I could just see. And then she started</p> <p>19 switching people. And I was like, Hmm, someone must be</p> <p>20 underage.</p> <p>21 Q. Okay. All right. And you concluded that was</p> <p>22 the case, the reason for the switch?</p> <p>23 A. Most likely, yes.</p> <p>24 Q. Okay. And what age do you have to be to be in</p> <p>25 the exit row?</p>	<p style="text-align: right;">Page 39</p> <p>1 A. Correct.</p> <p>2 Q. Because you didn't see or hear any of this?</p> <p>3 A. Correct.</p> <p>4 Q. Okay. And she even said the words about, like,</p> <p>5 he wasn't allowed to be by another passenger?</p> <p>6 A. Correct.</p> <p>7 Q. Okay. So this was all essentially suppositions</p> <p>8 that Anna Bond made and passed on to you?</p> <p>9 A. Yeah, completely assumptions from her as well,</p> <p>10 yeah.</p> <p>11 Q. Okay. All right. Did she indicate that she</p> <p>12 inquired as to the relationship of the -- of the two?</p> <p>13 A. We never assumed anything, hmm-mm. She didn't</p> <p>14 say.</p> <p>15 Q. Okay. So she didn't say, for instance, I asked</p> <p>16 if the two were related?</p> <p>17 A. No.</p> <p>18 Q. All right. Now, you have aboard the aircraft</p> <p>19 the passenger manifest, correct?</p> <p>20 A. We have a manifest. All it has on there is how</p> <p>21 many people are connecting and then the flight number and</p> <p>22 where we're going. It has no names.</p> <p>23 Q. Oh, I see. So they don't give you a printout</p> <p>24 of, for instance, Mr. Smith is in 1A and Mrs. Smith is in</p> <p>25 1B?</p>
<p style="text-align: right;">Page 38</p> <p>1 A. Fifteen.</p> <p>2 Q. And at this point, this was the first time that</p> <p>3 you noticed the Delvecchias?</p> <p>4 A. Yes.</p> <p>5 Q. Okay. And they were switched with some people</p> <p>6 in Row 17; is that your recollection?</p> <p>7 A. Correct, yes.</p> <p>8 Q. Okay. So when Anna Bond walked up to the front</p> <p>9 of the aircraft after making the switch, what</p> <p>10 specifically did she say to you?</p> <p>11 A. She said, "There's a boy that was in Row" -- I</p> <p>12 don't remember if they were in 13 or 12, in the exit row,</p> <p>13 "that I questioned. And so I asked him, 'Hey, what --</p> <p>14 how old are you?' And the dad quickly answered for him."</p> <p>15 And at this time, the boy was in the aisle, and the dad</p> <p>16 was in the middle. And when they had switched rows to</p> <p>17 Row 17, she thought it was very weird that the dad made</p> <p>18 the son get in first so, like, he wasn't allowed to be</p> <p>19 around a different passenger.</p> <p>20 And she also noted that it was very strange that</p> <p>21 the son couldn't speak for himself. We ask kids all the</p> <p>22 time how old they are, and they always speak for</p> <p>23 themselves. But the dad stepped in very quickly and</p> <p>24 said, "He's 11," or, "He's 12."</p> <p>25 Q. And this is all as related to you by Anna Bond?</p>	<p style="text-align: right;">Page 40</p> <p>1 A. Correct. They don't. They used to. They got</p> <p>2 rid of that in 2017.</p> <p>3 Q. Did they tell you why?</p> <p>4 A. Wasting paper.</p> <p>5 Q. Do you remember that specifically that they said</p> <p>6 that?</p> <p>7 A. I don't think there was anything official, but</p> <p>8 that's what I heard.</p> <p>9 Q. Okay. You heard that from other flight</p> <p>10 attendants?</p> <p>11 A. Yes.</p> <p>12 Q. Okay. So what year did you say they got rid of</p> <p>13 the ...?</p> <p>14 A. I think 2017.</p> <p>15 Q. 2017?</p> <p>16 A. Umm-hmm.</p> <p>17 Q. Okay. So for two years, then, you never knew</p> <p>18 the names of any of your passengers?</p> <p>19 A. Correct. It's very hard if there was an</p> <p>20 emergency.</p> <p>21 Q. Did you ever mention this to management that it</p> <p>22 would be hard in an emergency?</p> <p>23 A. Yeah. We've all complained about -- well,</p> <p>24 multiple people have sent emails and complained about it,</p> <p>25 but nothing has been changed. I did not personally send</p>

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<p style="text-align: right;">Page 45</p> <p>1 Ms. Shelke said correct?</p> <p>2 A. Correct.</p> <p>3 Q. All right. So at the time of this flight, it</p> <p>4 would be -- it would have been impossible for there to</p> <p>5 have been an unaccompanied minor?</p> <p>6 A. Correct.</p> <p>7 Q. All right. That would have been screened out</p> <p>8 well before anybody got on the flight?</p> <p>9 A. Yes.</p> <p>10 Q. Okay. All right. So, in this case, then,</p> <p>11 because of what Anna Bond said to you, you knew that this</p> <p>12 was a father and his son who were traveling together?</p> <p>13 A. Yes.</p> <p>14 Q. But you knew that Anna Bond had raised concerns</p> <p>15 or suspicions of something?</p> <p>16 A. Yes.</p> <p>17 Q. What did you think the something was?</p> <p>18 A. I didn't see anything myself. So I -- I took</p> <p>19 her words and understood what she was saying and just</p> <p>20 went on with my job.</p> <p>21 Q. Now, you were aware at the time because you had</p> <p>22 seen them move that the father was white and the son was</p> <p>23 black?</p> <p>24 A. Yes.</p> <p>25 Q. What, if anything, did Anna Bond say to you</p>	<p style="text-align: right;">Page 47</p> <p>1 Amanda, I think, she -- it was my first time flying with</p> <p>2 her. She walked up to the front and said -- because we</p> <p>3 were all aware of the situation, I guess. I don't know</p> <p>4 if Anna had went back to the back and just said, Hey,</p> <p>5 keep your eyes out on 17, or if she had called. I don't</p> <p>6 remember. But I do know that we were all aware.</p> <p>7 And so Amanda walked up to the front, had</p> <p>8 glanced over at 17 on her way up doing trash run, and</p> <p>9 came up to me and -- me and Anna and said, "He's kind</p> <p>10 of -- the older gentleman is stroking the face of this</p> <p>11 younger boy. Come and look," kind of a thing, is what</p> <p>12 she said.</p> <p>13 Q. All right. And that is what you remember that</p> <p>14 she said? I mean --</p> <p>15 A. Correct.</p> <p>16 Q. -- in other words, that's an accurate depiction</p> <p>17 of what Amanda, if that was her name, the D, said to you?</p> <p>18 A. Correct.</p> <p>19 Q. Okay. That, "The older gentleman is stroking</p> <p>20 the face" --</p> <p>21 A. -- "the little boy's face," yeah.</p> <p>22 Q. "The little boy's face." All right.</p> <p>23 Now, did you see him stroking the little boy's</p> <p>24 face?</p> <p>25 A. Yeah. So I did a -- a trash run. We don't want</p>
<p style="text-align: right;">Page 46</p> <p>1 about that fact?</p> <p>2 A. She -- not that I recall anything about the</p> <p>3 race. She might have said, I don't know the relation</p> <p>4 because of this, but I don't ever remember her saying</p> <p>5 anything about the race at all.</p> <p>6 Q. Okay. She said, I don't know their relation</p> <p>7 because of their race?</p> <p>8 A. If she would have said anything, she probably</p> <p>9 would have said that. But I don't remember her saying</p> <p>10 anything about the race at all.</p> <p>11 Q. Okay. And you, I think, just said that he --</p> <p>12 "he," the father -- was either a foster dad or, and then</p> <p>13 you trailed off.</p> <p>14 What did you mean by that?</p> <p>15 A. I meant by -- because I did say "unaccompanied</p> <p>16 minor." I guess I meant it could have been like an uncle</p> <p>17 or someone traveling with the kid that was a trusted</p> <p>18 person that they bought their tickets together.</p> <p>19 Q. All right. All right. So what was the next</p> <p>20 thing that you recall on the flight?</p> <p>21 A. About the situation? Because we went on just</p> <p>22 with our flight duties. We took off. We got into the</p> <p>23 air. We started to set up our carts. That's the first</p> <p>24 thing that we always do, to get ready for service. And</p> <p>25 the D flight attendant, which I believe her name was</p>	<p style="text-align: right;">Page 48</p> <p>1 to make anything obvious. So we do trash runs if there's</p> <p>2 something that we feel like we need to go through the</p> <p>3 cabin and -- and look at.</p> <p>4 So I did a trash run, and, you know, trash,</p> <p>5 trash, trashed everybody. And as -- as I was -- I was</p> <p>6 going past 17, I did see the older gentleman lean over</p> <p>7 and just -- just went like this, up and down, up and</p> <p>8 down, up and down. And it was just a very awkward thing</p> <p>9 to see.</p> <p>10 Q. Because he was white and the boy was black?</p> <p>11 A. No. Because I would -- even my mom wouldn't do</p> <p>12 that to me, just sit there and stroke my face up and</p> <p>13 down. If there was something on my face, she would get</p> <p>14 it off, but that's it. She wouldn't sit there and</p> <p>15 continue doing it.</p> <p>16 It had to have been at least 30 seconds from</p> <p>17 Amanda had passed by and seen them doing this that I went</p> <p>18 back to 17 and -- and saw him still doing it.</p> <p>19 Q. Were they talking to each other --</p> <p>20 A. No.</p> <p>21 Q. -- at that time?</p> <p>22 A. Hmm-mm.</p> <p>23 Q. You're positive that they weren't talking to</p> <p>24 each other?</p> <p>25 A. Positive, yes.</p>

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<p style="text-align: right;">Page 49</p> <p>1 Q. And how long did you keep your eyes on them at 2 that point? 3 A. A few seconds. 4 Q. All right. So in that couple of seconds, they 5 weren't saying any words to each other? 6 A. Correct. 7 Q. They were both awake? 8 A. Umm-hmm. 9 Q. You have to say "yes" or "no." 10 A. Yes, sorry. 11 Q. All right. So now, certainly you've seen people 12 who are related to each other make gestures of affection? 13 A. All the time. 14 Q. Okay. You say this is not something that your 15 mother would do to you? 16 A. No. 17 Q. But would you agree that it's something that 18 another mother or father might do to a child? 19 A. No. 20 Q. Tell -- show me again what it is exactly that 21 you feel that no parent would do to their child. 22 A. He just was leaning over very closely and just 23 up and down, just stroking, just looking at him, just 24 stroking his face up and down, up and down. 25 Q. All right.</p>	<p style="text-align: right;">Page 51</p> <p>1 A. To me it was, yes. 2 Q. It was to you? 3 A. Yeah. Because it wasn't -- it wasn't him 4 getting anything off of the guy. It wasn't him just like 5 this. Like, it was -- it was just an up and down. And 6 then as I -- because I went through the cabin, and then I 7 came back through, and he was still doing it, so. 8 Q. All right. Well, let's -- let's break this down 9 here. 10 If it had been a little girl, would that have 11 seemed abnormal to you? 12 A. Yeah, it would have. 13 Q. If the parent had been a mother, it would have 14 seemed abnormal to you? 15 A. Absolutely. 16 Q. So basically, no parent of any sex in your mind 17 should stroke the child's face of any sex? 18 A. No. No, they shouldn't. 19 Q. Is -- is this something that you've learned in 20 your upbringing? 21 A. Yeah. 22 Q. Okay. And -- and how in your upbringing was 23 this conveyed to you? 24 A. I don't know. It just seemed inappropriate. 25 I have worked -- I worked at the Foster Center</p>
<p style="text-align: right;">Page 50</p> <p>1 A. It just wasn't normal. I've never seen that. 2 Q. Well, it's something that you've never seen 3 and -- and you believe that no parent would do that with 4 a child? 5 A. Not for that long. 6 Q. Well, you said a couple seconds. 7 A. Well, I guess I'm just going off of what Amanda 8 had seen. She's like, "This is what's happening. Go and 9 look," and he was still doing it. 10 Q. Did Amanda say to you how many seconds she 11 observed this going on? 12 A. I'm sure she just walked by. 13 Q. So it's possible that it could have happened 14 just for a brief moment when Amanda saw it and then not 15 happened until you saw it again for a brief moment? 16 A. Yeah, that's very possible. 17 Q. So it could have been just a couple of seconds 18 total of a father touching his son's face? 19 A. Yes. 20 Q. And you've never seen a father touch his son's 21 face? 22 A. Not like that, no. 23 Q. Well, you keep saying "like that" with -- with 24 some measure of disgust. But what you're representing 25 with your hands doesn't seem that abnormal, does it?</p>	<p style="text-align: right;">Page 52</p> <p>1 of Utah Youth Village here, and they have foster kids. 2 And I've -- I've seen a lot of just parental and kid 3 interaction with that. I mean, at Lagoon -- I've worked 4 in a lot of situations, and I just kind of know what to 5 look for. And that, it wasn't a normal stroking. It 6 wasn't normal. 7 Q. When you say "what to look for," in what context 8 are you speaking? 9 A. As a flight attendant. 10 Q. Well, now, you were talking about working at the 11 Lagoon. You weren't working there as a flight attendant. 12 A. Oh, well, correct, yeah. 13 Q. All right. So you also mentioned working at 14 some foster care place? Where was that? 15 A. Utah Youth Village. It's in Salt Lake. 16 Q. You have to speak a little slower. 17 A. Sorry. 18 Q. Utah ...? 19 A. Youth Village. 20 Q. Youth Village. 21 A. Umm-hmm. 22 Q. And who runs that? 23 A. I don't remember his name. 24 Q. It's just run by a single individual? 25 A. Correct.</p>

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<p style="text-align: right;">Page 57</p> <p>1 parent are basically the same.</p> <p>2 Q. Well, I'm sorry. You didn't know these</p> <p>3 children's parents, did you?</p> <p>4 A. No.</p> <p>5 Q. You only knew your mom, acting as a foster</p> <p>6 parent?</p> <p>7 A. Yeah, that's right. Yeah.</p> <p>8 Q. Okay. So presumably, the way your mom</p> <p>9 interacted with them would be the same way that your mom</p> <p>10 interacted with you?</p> <p>11 A. Correct, yeah.</p> <p>12 Q. Okay. So as far as -- as how -- for instance,</p> <p>13 a -- a parent in the Congo might interact with their</p> <p>14 child, you wouldn't know?</p> <p>15 A. No.</p> <p>16 Q. Okay. And with respect to how a child from</p> <p>17 Africa might want a parent to interact with them, you did</p> <p>18 or didn't know?</p> <p>19 A. What the child would expect? I guess I don't.</p> <p>20 Q. Okay. All right. So you would agree with me</p> <p>21 that your knowledge of social norms involving African</p> <p>22 children is rather limited?</p> <p>23 A. Yes.</p> <p>24 Q. Okay. So at this point, there is a situation,</p> <p>25 as you've described it, aboard the aircraft. And the</p>	<p style="text-align: right;">Page 59</p> <p>1 Media 2. We're back on the record. The time is 11:08.</p> <p>2 Q. (BY MR. MCKAY:) All right. So before we broke,</p> <p>3 we were talking about instances in which you had seen a</p> <p>4 parent answer for a minor child, right?</p> <p>5 A. Yes.</p> <p>6 Q. And you had not noticed anything unusual about</p> <p>7 that happening?</p> <p>8 A. No.</p> <p>9 Q. Okay. But in this case because Anna Bond told</p> <p>10 you that she thought it was unusual, then you thought it</p> <p>11 was unusual, too?</p> <p>12 A. Yes.</p> <p>13 Q. Okay. And you had, I presume, seen parents or</p> <p>14 other people decide who is going to sit in the window and</p> <p>15 who is going to sit in the center seat, right?</p> <p>16 A. Yes.</p> <p>17 Q. And, in fact, if the choice of a couple -- if</p> <p>18 the choices of a couple are window seat and middle seat,</p> <p>19 it's kind of a nice gesture to take the middle, isn't it?</p> <p>20 A. Yes.</p> <p>21 Q. Okay. And it's easier to sleep if you're in the</p> <p>22 window seat?</p> <p>23 A. Yes.</p> <p>24 Q. And this was an evening flight?</p> <p>25 A. Yes.</p>
<p style="text-align: right;">Page 58</p> <p>1 situation is based on two things. One, Anna Bond saying</p> <p>2 that she thought the interaction of the dad and the son</p> <p>3 was odd to her.</p> <p>4 A. Right.</p> <p>5 Q. Okay. But she wasn't very specific, except</p> <p>6 saying that the father answered for the child, and the</p> <p>7 father directed where the child would sit on the</p> <p>8 airplane?</p> <p>9 A. Correct.</p> <p>10 Q. Okay. Prior to this during your many flights,</p> <p>11 had you ever witnessed a parent answering a question for</p> <p>12 a child?</p> <p>13 A. Yeah. But the -- the child still normally</p> <p>14 speaks up. I mean, the -- the child would start to</p> <p>15 answer, and then they'd be like, "Yeah, you're -- you</p> <p>16 know you're five," or whatever. And it's -- I guess it's</p> <p>17 more of the -- the parent is more pushing along the child</p> <p>18 but not just answer for them completely. No, I've never</p> <p>19 seen that.</p> <p>20 Q. Okay. Let's take a ten-minute break.</p> <p>21 MS. SHELKE: Okay.</p> <p>22 MR. MCKAY: We've been going about an hour.</p> <p>23 THE VIDEOGRAPHER: Off the record. 10:56.</p> <p>24 (A break was taken from 10:56 a.m. to 11:08 a.m.)</p> <p>25 THE VIDEOGRAPHER: This is the beginning of</p>	<p style="text-align: right;">Page 60</p> <p>1 Q. And people were sleeping?</p> <p>2 A. Yes.</p> <p>3 Q. Okay.</p> <p>4 A. Going to Vegas. Some people were sleeping.</p> <p>5 Q. Okay. All right. So because Anna Bond felt</p> <p>6 uncomfortable with what she had seen and described it as</p> <p>7 a situation, then you felt uncomfortable as well?</p> <p>8 A. I don't feel I felt uncomfortable, I just was</p> <p>9 more aware.</p> <p>10 Q. Now, nothing that Anna Bond had said to you or</p> <p>11 that you had observed indicated that these people were a</p> <p>12 risk to the safety of the flight?</p> <p>13 A. Absolutely not.</p> <p>14 Q. Okay. So, again, I ask what was it that you</p> <p>15 were concerned about?</p> <p>16 A. Before the face rubbing, nothing. I -- I mean,</p> <p>17 we -- we -- we're just there for the safety of the</p> <p>18 people. We look around. If we see anything that we have</p> <p>19 never seen before, we just kind of tell each other. And</p> <p>20 then we are all just aware of that person. We all just</p> <p>21 keep an eye out a little better on the person that the</p> <p>22 one person -- the one flight attendant mentioned.</p> <p>23 Q. Well, what if one of your fellow flight</p> <p>24 attendants says, Hey, look at that lady with the pink hat</p> <p>25 and the big feather in it? That would be something maybe</p>

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<p style="text-align: right;">Page 65</p> <p>1 Q. Didn't you feel an obligation to question Anna 2 Bond more about why she was uncomfortable? 3 A. No, because there are situations that arise all 4 the time that could make us feel uncomfortable for just a 5 moment, and then, you know, nothing happens. But we 6 still keep an eye out, especially when it's a kid's 7 safety. 8 Q. And you felt that A.D. was in an unsafe 9 position? 10 A. I would say that he wasn't -- I -- I didn't feel 11 that he was unsafe at that time, no. 12 Q. Okay. Now, let's get back to the concept of 13 trafficking because it appears your employer is intent on 14 educating all of you flight attendants on this concept of 15 trafficking. So I want to be clear about what you 16 understand trafficking to be. 17 Trafficking connotes taking somebody from one 18 place on another; does it not? 19 A. Yes. 20 Q. And for what reason? 21 A. I don't know. I mean, I've heard of people 22 selling off children or -- just illegal activity, but not 23 anything specifically. 24 Q. Did you feel in this instance, based on what 25 Anna Bond had told you and what you had seen Peter doing</p>	<p style="text-align: right;">Page 67</p> <p>1 A. They don't until it's an emergency. They really 2 don't. I don't think they -- 3 Q. It's not very funny because there's several 4 people that died because of that. 5 And you are responsible for making sure that 6 carts don't run into people's feet and legs and elbows -- 7 A. Yes. 8 Q. -- right? 9 But I'm curious where in your duties all of a 10 sudden you became in charge of making sure that people 11 aren't quote, unquote, trafficked? 12 A. I mean, if -- the safety of the child. The 13 safety of the passenger. I mean, we also make sure that 14 this drunk person isn't going to sit on this other drunk 15 person, or -- we are -- yeah. We're there for them in 16 all ways. I mean, verbally, physically, in every way. I 17 mean, if two people were starting to yell at each other, 18 I would get involved in that, too, and separate them, 19 too. 20 Q. If you thought a child was being trafficked and 21 the child was 12 years old, wouldn't you find a way to 22 ask the child if he was safe? 23 A. By separation, yes. 24 Q. All right. 25 A. You have to get them separated by passing them a</p>
<p style="text-align: right;">Page 66</p> <p>1 with A.D.'s face, that Peter was going to sell A.D. in 2 Las Vegas? 3 A. I have no idea. 4 Q. You have no idea? 5 A. No. 6 Q. Okay. 7 A. My -- my -- my job is to -- to just protect 8 everyone on the plane. I don't know what happens on the 9 ground. 10 Q. Okay. Your job is to make sure that they are 11 safe from risks that are inherent in the operation of 12 airplanes? 13 A. Correct, yeah. 14 Q. And suspicions of trafficking really doesn't 15 involve anything about the operation of airplanes, does 16 it? 17 A. Well, that -- that's up to the captain. The 18 captain flies the plane. I am solely for those 19 passengers 100 percent. Even in an emergency, I'm the 20 one who gets those passengers off. 21 Q. Right. You're the one that makes sure that they 22 get to the exits and they get safely out the exits, that 23 they are wearing their life vests, and that they don't 24 inflate them inside because they'll stick to the ceiling. 25 And it's something they never tell you, by the way.</p>	<p style="text-align: right;">Page 68</p> <p>1 note and having them come to the bathroom, or signaling 2 for them to go to the restroom and then ask them there, 3 yes. 4 Q. Did you do either of those things with respect 5 to A.D.? 6 A. No, because until -- no -- no, I didn't. 7 Q. All right. What was the next thing that you 8 recall occurring? And I -- I'll remind you that we're up 9 to the point where you have seen Peter touching A.D.'s 10 face. 11 A. I went up to the front, and then all of us 12 congregated to the front to talk about this situation. 13 And we all equally felt that it was just something we 14 needed to bring up to the captain's attention. 15 Q. So, and when you say "we all," you mean A, B, C, 16 and D? 17 A. Correct. 18 Q. Okay. 19 A. We -- yes. We don't usually go up to the 20 captain unless we are all on the same page. 21 Q. All right. So that is yourself and Anna Bond? 22 A. (No audible response.) 23 Q. You have to say "yes." 24 A. Oh, yes. 25 Q. Yes? Okay.</p>

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<p style="text-align: right;">Page 69</p> <p>1 A. Yes.</p> <p>2 Q. And Amanda Nichol?</p> <p>3 A. Yes.</p> <p>4 Q. And Scott Warren?</p> <p>5 A. Correct.</p> <p>6 Q. And you're all meeting where, in the -- in the</p> <p>7 aft gal --</p> <p>8 A. No, forward.</p> <p>9 Q. -- or, I'm sorry, the -- the fore gal?</p> <p>10 A. Forward gal, yes.</p> <p>11 Q. Okay. And what specifically was said in that</p> <p>12 meeting?</p> <p>13 A. I came back up to the front and said I, as well,</p> <p>14 saw the -- the man touching the little boy's face. I</p> <p>15 don't think we ever -- you can't assume a relationship</p> <p>16 like that. I don't -- I don't know if I ever assumed</p> <p>17 that it was the father. I -- I don't remember. But I --</p> <p>18 I probably said that the man was touching the young</p> <p>19 man's face -- the boy's face. And -- and I said, "I</p> <p>20 don't know. I just don't have a good feeling about it."</p> <p>21 And everyone else was, like, "Me, either." And so --</p> <p>22 Q. Well, when you say "everybody," everybody at</p> <p>23 this point, all four flight attendants, are up at the</p> <p>24 front, right?</p> <p>25 A. Umm-hmm. Umm-hmm.</p>	<p style="text-align: right;">Page 71</p> <p>1 time for a break." We had been up in the air now for a</p> <p>2 good while that, you know, they might want to stand up</p> <p>3 and get out. So he said, "Yes, it's time for a break."</p> <p>4 And I said, "Perfect."</p> <p>5 And so as I went up there -- because there's --</p> <p>6 we just did the normal change to get up into the cockpit.</p> <p>7 What happens is the flight attendant then appears in</p> <p>8 the -- goes into the cockpit, and all three of you guys</p> <p>9 are up there. And then one of them will exit after that.</p> <p>10 Q. Right. Who exited?</p> <p>11 A. Well, nobody at first because I decided to tell</p> <p>12 them --</p> <p>13 Q. Okay.</p> <p>14 A. -- first.</p> <p>15 Q. So at this point, all you've discussed with the</p> <p>16 captain on the phone is that there's going to be a break?</p> <p>17 A. Correct.</p> <p>18 Q. And they let you in --</p> <p>19 A. Umm-hmm.</p> <p>20 Q. -- to the cockpit?</p> <p>21 And you're there in the cockpit with the captain</p> <p>22 and the first officer?</p> <p>23 A. Correct.</p> <p>24 Q. And they're both still in their seats?</p> <p>25 A. Yes.</p>
<p style="text-align: right;">Page 70</p> <p>1 Q. You have to say "yes" or "no." I'm sorry.</p> <p>2 A. Yes, sorry.</p> <p>3 Q. So how did they get there? When did they get</p> <p>4 there? You had just said that Amanda had come to the</p> <p>5 front and said that she had seen something.</p> <p>6 A. Yes. So I don't know if someone called Scott,</p> <p>7 but Scott eventually made his way up to the front after I</p> <p>8 came back.</p> <p>9 Q. Do you know Scott?</p> <p>10 A. I had flown with him once before, but not</p> <p>11 personally, no.</p> <p>12 Q. Okay. So now everybody's there, and you come</p> <p>13 back and say, Yeah, I saw it too?</p> <p>14 A. Yes.</p> <p>15 Q. And it made you uncomfortable?</p> <p>16 A. Yes.</p> <p>17 Q. And everybody else agreed?</p> <p>18 A. Yes.</p> <p>19 Q. And then the determination was made to tell the</p> <p>20 captain?</p> <p>21 A. Correct.</p> <p>22 Q. All right. How did you go about telling the</p> <p>23 captain?</p> <p>24 A. So I just called him normally and asked him if</p> <p>25 he needed anything. And he said, "Yeah, it's actually</p>	<p style="text-align: right;">Page 72</p> <p>1 Q. And you, then, say, "Hey" -- what?</p> <p>2 A. I just -- so I told them from the very</p> <p>3 beginning, like, Hey, when, you know, they sat down, Anna</p> <p>4 went to brief them. He wasn't old enough. The dad</p> <p>5 answered. Then when they went to -- and this boy didn't</p> <p>6 say anything throughout the whole entire conversation,</p> <p>7 and usually kids talk. And so when they went to this Row</p> <p>8 17, same thing. They sat down, and she just felt weird</p> <p>9 about it. It just not -- it just made her feel</p> <p>10 uncomfortable.</p> <p>11 And then -- and then Amanda had seen the dad</p> <p>12 rubbing the boy's face. And then I had done a trash run</p> <p>13 30 seconds later, had seen it, came back, still saw it.</p> <p>14 And I just -- yeah, that's exactly what I told him.</p> <p>15 Q. Nothing more?</p> <p>16 A. That we all just felt that it was very</p> <p>17 uncomfortable.</p> <p>18 Q. Okay. And what happened next?</p> <p>19 A. Then someone called up to the cockpit. I can't</p> <p>20 recall who it was. I --</p> <p>21 Q. So it would have been one of the other three?</p> <p>22 A. The other three.</p> <p>23 Q. Okay.</p> <p>24 A. And in the meantime, Scott, because he belongs</p> <p>25 in the back of the area of the plane, went back to the</p>